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14 *Shriram, Shirley M. Tilghman and Nominal*
15 *Defendant Google Inc.*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

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1 WHEREAS, on August 7, 2014, the Settling Parties executed a Stipulation of Settlement
2 and filed a Motion for Preliminary Approval of the Proposed Derivative Settlement in these
3 proceedings;

4 NOW, THEREFORE, subject to Court approval, the Settling Parties agree as follows:

- 5 1. After review of the preliminary approval papers, the Court will either enter the
6 preliminary approval and scheduling order submitted with those papers, or will
7 schedule a hearing on preliminary approval at a time to be specified by the Court.
- 8 2. Pursuant to the Stipulation of Settlement, all pending motions in the action
9 captioned *In re Google Inc. Shareholder Derivative Litigation*, No. 11-CV-4248-
10 PJH, including Defendants' pending Motion to Dismiss the Second Amended
11 Complaint filed on December 6, 2013 (Dkt. No. 105) and, in *City of Orlando*
12 *Police Pension Fund v. Page, et al.*, Case No. 13-CV-2038-PJH, Defendants'
13 Motion for Summary Judgment filed on November 1, 2013 (Dkt. No. 43) together
14 with all papers submitted in support or in opposition thereto, are hereby
15 withdrawn *ab initio*, and any materials filed under seal in connection with such
16 motions, as well as the documents filed by Defendants with the Court *in camera*
17 on February 24, 2014, shall be returned by the Clerk of the Court to the party that
18 submitted such materials.

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1 DATED: August 7, 2014

WILSON SONSINI GOODRICH &
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11 DATED: August 7, 2014

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1 I, Elizabeth C. Peterson, am the ECF user whose ID and password are being used to file
2 this STIPULATION AND [PROPOSED] ORDER REGARDING PROCEEDINGS ON
3 REVIEW OF SETTLEMENT. In compliance with Civil L.R. 5-1, I hereby attest that Boris
4 Feldman, Benny C. Goodman III, and Jeffrey S. Abraham have concurred in this filing.

5 _____
6 s/ Elizabeth C. Peterson
Elizabeth C. Peterson

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ORDER

Pursuant to the Stipulation, IT IS SO ORDERED.

DATED: _____

**THE HONORABLE PHYLLIS J. HAMILTON
UNITED STATES DISTRICT JUDGE**